



October 27, 2011

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at a Program Sponsored by the Board of Directors of the Science, Exploration, and Education Center.

On November 8, 2011, the Board of Directors of the Science, Exploration, and Education Center (SEEC) is sponsoring a program at the Greenbelt Marriott in Greenbelt, Maryland. The purpose of the program is to provide information about SEEC's plans for an education and visitor center at NASA Goddard Space Flight Center. NASA Goddard Center Director Robert Strain and SEEC Board member Norm Augustine will be guest speakers. Light refreshments will be served.

Approximately 200 people have been invited to the program from NASA, Maryland state and county public schools, Maryland state and local governments, universities, and industry. The estimated cost per person for the refreshments and room rental is \$28.

Attendance at the program will allow NASA employees an opportunity to discuss issues of interest to the science and education community, including how best to disseminate information and educate the public about NASA research and discoveries, with other attendees from local governments, universities, schools, and industry. I therefore conclude that NASA's interest in its employees attending this event outweighs any concern that free attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Accordingly, NASA employees whose duties do not substantially affect SEEC or a majority of its members may accept an invitation for free attendance to the program for themselves and their guests.

NASA employees whose duties substantially affect SEEC or a majority of its members, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Robert M. Stephens", with a long, sweeping horizontal line extending to the right.

Robert M. Stephens